UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
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April 15, 1999

Ms. Luann Tetirick
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-5006

Mr. Michael McClelland, Code 62.3
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-5006

RE: Draft Phase IV Radiation Investigation Field Sampling Work Plan, February 24, 1999

Dear Ms. Tetirick and Mr. McClelland:

EPA has completed it review of the above referenced document and has several comments. Our comments are summarized below.

1. **Section 2.1, Page 2:** The appropriate DCGL for the residual Cs137 contamination at the peanut spill is the site specific background for Cs137.

2. **Section 3.1.1, Page 4:** The commercial scenario PRG for Cs137 and its progeny, Ba137, is 0.072 picoCurie per gram. This value is very similar to the typical Cs137 background values for California soils.

3. **Section 3.2, Page 4:** No typical ambient levels for either Co60 or Eu152 were ever reported in the previous radiation scoping survey work performed by PRC. The presence of either radionuclide at detectable levels constitutes contamination.

4. **Section 5.3, Page 7:** MARSSIM uses the Wilcoxon Rank Sum Test to determine when a cleanup has been done to be considered indistinguishable from background. California DTSC has published a document that outlines an indistinguishable from background strategy for arsenic and other heavy metals titled "**Selecting Inorganic Constituents as Chemicals of Potential Concern for Risk Assessment at Hazardous Waste Sites & Permitted Facilities.**" This document is available from CaDTSC's website.

5. **Section 5.4, Page 8:** The DCGLs for Co60 and Eu152 should be the commercial scenario PRGs. As stated above the DCGL for Cs137 should be its site specific background.

6. **General.** It was not clear if each individual sample result from previously contaminated areas is being compared against the background, or the average of all of the sample results is being used.

One additional comment: On December 14, 1998, EPA's Steve Dean met LtCmdr Vinnie Deinnocentiis and several staff members from Tetra Tech at Building 364. The group collectively determined the sampling points for the additional Cs137 peanut spill background samples. Mr. Dean used a new Exploranium GR130 to perform gamma spectrum analyses within the peanut spill itself and at several of the selected background sampling points on the asphalted areas outside of Building 364. The GR130 only detected Cs137 in the peanut spill area. None of the other spectra taken at our selected background sampling locations reported Cs137 present.

If you have any questions or comments please contact me at (415)744-2409 or Steve Dean at (415) 744-2391.

Sincerely,

Claire Trombadore
Remedial Project Manager

cc: Steve Dean, EPA
Chein Kao, DTSC
David Leland, RWQCB